

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)**

MICHAEL ALAN CROOKER Plaintiff, v. RESOLUTION MANAGEMENT, SHORELINE COLLECTION SERVICE, BENUCK & RAINEY, INC., HOFFMAN, WEINBERG & O'BRIEN, PREFERRED CREDITOR'S SERVICE, & STRAUSS FACTOR, LANG & LYONS Defendant(s).	CIVIL ACTION NO. (REMOVAL OF ACTION)
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**NOTICE OF REMOVAL OF
CIVIL ACTION FROM STATE COURT**

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Defendants, RESOLUTION MANAGEMENT, HOFFMAN, WEINBERG & O'BRIEN,
PREFERRED CREDITOR'S SERVICE & STRAUSS FACTOR LAING & LYONS (hereinafter
referred to as the "Removing Defendants"), by and through their undersigned attorney,
respectfully represents as follows:

1. The removing parties are Defendants in the above entitled action.
2. On or about January 10, 2010, the above entitled action was commenced, by the filing of a Civil Action Complaint against all defendants in the Centre County Court of Common Pleas, Case No. 2009-5745 (the "State Court Action"), and this action is now pending therein. A *true and correct copy of the Civil Complaint is attached and marked as **Exhibit A**.*
3. No service was effectuated upon any defendant within thirty (30) days of the filing of the complaint, and the State Court Action was thereafter reinstated by the Plaintiff on or about March 26, 2010, again in the Centre County Court of Common Pleas.

4. The State Court Action seeks, *inter alia*, the following relief against all parties: monetary damages for violation of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et seq.* (See *Exhibit A*).

5. This Court has original jurisdiction over the above entitled action pursuant to 28 U.S.C. §1331, as it involves a federal question with regards to the alleged violations of the Fair Debt Collections Practice Act, 15 U.S.C. §1692 *et seq.* Thus, this action must therefore be removed to this Court pursuant to 28 U.S.C. §1441(a). Furthermore, this Court will have pendent jurisdiction over any other state claims that may be asserted by the Plaintiff.

6. All Removing Defendants were served with a copy of the Complaint by certified mail between the time period of April 10, 2010 through April 16, 2010.

7. This notice is timely filed with the Court within thirty (30) days after service of the Complaint on the Removing Defendants in the above entitled action pursuant to 28 U.S.C. §1446(b).

8. All Removing Defendants consent to removal.

9. Defendants, SHORELINE COLLECTION SERVICE, BENUCK & RAINEY, INC., have not been served as of the date of the filing of this removal.

WHEREFORE, the removing parties pray that the above entitled civil action be removed from the Center County Court of Common Pleas.

Respectfully submitted,
MAURICE & NEEDLEMAN, P.C.

/s/Joann Needleman, Esquire
JOANN NEEDLEMAN, ESQUIRE
935 One Penn Center
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103
(215) 789-71751
(215) 563-8970 fax
joann@mnlawpc.com
Attorney for Removing Defendants,
RESOLUTION MANAGEMENT,
HOFFMAN, WEINBERG & O'BRIEN,
PREFERRED CREDITOR'S SERVICE &
STRAUSS FACTOR LAING & LYONS

Date: April 26, 2010

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)**

MICHAEL ALAN CROOKER Plaintiff, v. RESOLUTION MANAGEMENT, SHORELINE COLLECTION SERVICE, BENUCK & RAINEY, INC., HOFFMAN, WEINBERG & O'BRIEN, PREFERRED CREDITOR'S SERVICE, & STRAUSS FACTOR, LANG & LYONS Defendant(s).	CIVIL ACTION NO. (REMOVAL OF ACTION)
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CERTIFICATION OF SERVICE

I, JOANN NEEDLEMAN, ESQUIRE, hereby certify that on April 26, 2010, a true and correct copy of the attached NOTICE OF REMOVAL OF CIVIL ACTION FROM STATE COURT, was served upon the persons and in the manner set forth below:

FIRST CLASS MAIL, POSTAGE PREPAID, AS WELL AS ELECTRONICALLY IF APPLICABLE, to:

MICHAEL ALAN CROOKER
FEDERAL CORRECTIONAL INSTITUTION
PO BOX 1000
LORETTO, PA 15940

SHORELINE COLLECTION SERVICE
66 ANDERSON STREET
NEW HAVEN, CT. 06511

BENUCK & RAINEY, INC
399 U.S. HIGHWAY 4
BARRINGTON, NH 03825

Respectfully submitted,
MAURICE & NEEDLEMAN, P.C.

/s/Joann Needleman, Esquire
JOANN NEEDLEMAN, ESQUIRE
935 One Penn Center
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103
(215) 789-71751
(215) 563-8970 fax
joann@mnlawpc.com
Attorney for Removing Defendants,
RESOLUTION MANAGEMENT,
HOFFMAN, WEINBERG & O'BRIEN,
PREFERRED CREDITOR'S SERVICE &
STRAUSS FACTOR LAING & LYONS

Date: April 26, 2010